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**MONTHLY PROGRESS REPORT FOR PERIOD
ENDING JANUARY 31, 1988**

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ENCLOSURE**

MONTHLY PROGRESS REPORT FOR PERIOD ENDING JANUARY 31, 1988

SUMMARY

Actions associated with the Federal Facilities Compliance Agreement (FFCA) have continued during the month of January, 1988. Highlights of work completed this month, and a separate listing of ongoing actions are shown below.

The FMPC completed installation of seven (7) additional groundwater monitoring wells in support of the Remedial Investigation/Feasibility Study (RI/FS) during the month of January.

On January 21, 1988, FMPC, US EPA and Ohio EPA personnel met at the FMPC site to review the RI/FS groundwater sampling program. Discussions covered the locations of on-site wells, well development, and specifications for 100-series wells. Representatives from each organization also walked the perimeter of the FMPC Waste Storage Area to locate seeps from solid waste management units.

The fifth monthly RI/FS technical progress report was transmitted to the US EPA on January 19, 1986.

INTRODUCTION

As an integral part of the agreement between the U. S. Department of Energy (US DOE) and the US EPA signed on July 18, 1986, monthly reports are provided by US DOE to US EPA regarding the progress made to meet the provisions of that agreement. This report fulfills that requirement by describing actions undertaken at the Feed Materials Production Center (FMPC) during the period January 1 through January 31, 1988.

WORK ASSIGNMENTS AND PROGRESS

The status of ongoing and completed work in support of the FFCA is summarized in Table 1. Additional descriptions of the work being performed and progress on these tasks are shown in the following sections. In both this portion of the monthly report, and in Table 1 (attached) descriptions of actions are presented in a format similar to that of the FFCA.

• Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)

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1. Interim Remedial Measures

Sections 1.A & 1.B

Work on these sections is complete.

Section 1.C

A report was prepared covering interim stabilization actions taken for the K-65 silos. The report is undergoing internal review. FMPC also initiated the preparation of an Action Description Memorandum (NEPA Document) and sampling plan to address the sampling of materials in the K-65 silos.

The organization contracted for repackaging of Plant 8 thorium materials mobilized at the FMPC site. Design documents for equipment to be used in repackaging thorium materials currently stored in the Plant 8 bins and silo were received for FMPC review. Review comments were provided to the repackaging contractor. The thorium repackaging effort remains on schedule.

2. Remedial Investigation/Feasibility Study (RI/FS)

Section 2.A to 2.D

Work on these sections is complete.

Section 2.E

FMPC personnel completed the preparation of draft responses to the second round of EPA comments on the FMPC RI/FS Work Plan. A meeting has been scheduled for February 4, 1988 with EPA Region 5 in Chicago, Illinois to review the draft responses and to resolve any outstanding issues.

Activities are on schedule to support transmittal of the FMPC RI/FS Work Plan, Revision 2 to the US EPA by February 11, 1988.

Section 2.F

By the end of January, the FMPC had completed the installation of forty-two (42) groundwater monitoring wells. Seven new wells (224, 125, 264, 364, 138, 183 and 128) were completed during the reporting period. In January, 622 lineal feet of drilling was completed.

Wells are currently being installed at locations 304, 337 and 368. Samples were collected from cuttings from the newly installed wells and tested for concentrations of organics and radionuclides. The concentrations of organics and radionuclides in the field tested samples were not above background (as determined by field screening instruments).

As of the end of the reporting period, the FMPC still has not received written approval from the US EPA to install more than forty-five (45) wells on the FMPC site.

Surface radiological surveys continued on a limited bases (one crew only) during January. Health physics technicians continued with additional surveys at the west perimeter of the production area. Personnel from ORNL and ASI/IT Corporations performed a demonstration of the USRAD System at the January Technical Information Exchange meeting. The USRAD system utilizes telemetry devices to automatically combine radiation monitoring data and area location data with transmittal to a field-based computer file. Based upon the favorable feedback from this demonstration, WMC0 is proceeding with necessary contractual arrangements to acquire the system for use in collecting and recording the remaining surface radiological data required in support of the RI/FS.

On January 21, 1988, WMC0, ASI/IT and DOE personnel met with US EPA and Ohio EPA at the FMPC. The purpose of the meeting was to review progress to date on the RI/FS drilling program. Issues addressed included: 1) the location of on-site wells, 2) well development, and 3) construction specifications for 100-series wells. Also discussed were EPA requirements for the analysis of purge water. A meeting was scheduled for February 4, 1988 at Region-5 in Chicago, Illinois to discuss handling of purge water and other open items.

Also on January 21, 1988, representatives of OEPA, US EPA and FMPC walked the perimeter of the FMPC Waste Storage Area to locate seeps from solid waste management units. Positive identification of four seeps was made during this survey. A second walkover will be conducted during the Spring of 1988 to identify further seeps.

Volume 3 of the Characterization Investigation Study (CIS) remains in final review prior to issuance. Volume 3 presents the results of the comprehensive surface radiological survey of the FMPC waste storage area.

Section 2.G to 2.L

Work has not yet begun on these items.

3. Reports and Record Keeping

Section 3.B

The fifth RI/FS monthly technical progress report was transmitted to US EPA on January 19, 1988. The sixth monthly technical progress report will be transmitted during the month of February.

• Clean Air Act (CAA)

Section B - Items 1 through 4

The FMPC deliverable addressing Section B - Items 1 through 4 of the Clean Air Act Section of the FFCA was transmitted to U.S. EPA in August 1986.

A May 12, 1987 letter from William D. Franz to James A. Reafsnnyder stated that the FMPC air monitoring network should be reevaluated for its ability to measure representative concentrations of air pollutants. An evaluation of the FMPC air monitoring network was performed in December, 1986. Mr. Franz's concerns on the location of air monitoring station No. 6 were addressed during the joint OEPA/US EPA inspection on July 14-17, 1987. Actions are currently underway to modify existing monitoring stations to meet EPA siting criteria. Modifications of the monitoring stations will be completed by April 1, 1988.

The annual progress report for 1987 replacement of control devices is currently undergoing internal review. This report will be submitted to EPA during February, 1988.

Section C

Under the FFCA, DOE will comply with the reporting provisions contained in 40 CFR 61.94 (c). Under these provisions, the DOE is required to, by June 1 annually, submit a report which includes the results of monitoring emissions from points subject to 40 CFR 61 Sub-part H and their associated dose calculations. The annual report for calendar year 1986 emissions was provided to EPA in 1987, in accordance with the requirements of 40 CFR 61.94 (c). The annual report for calendar year 1987 is due for transmittal to EPA by June 1, 1988.

Section D.1 & D.2

The yearly particulate stack testing schedule for FY-88 was transmitted to EPA on December 31, 1987. The results of the FY-87 stack tests are complete. The ten (10) particulate stack test reports for 1987, including radiological results, will be transmitted to US EPA during the month of February.

Section E.2

The fifth Quarterly Particulate Emission Report covering the period from October through December of 1987 will be transmitted to EPA during the month of February 1988.

Sections F and G

Work on these sections is complete.

- **Resource Conservation and Recovery Act (RCRA)**

Sections A and B - Items A.1 through A.7 and Items B.1 through B.5

US EPA - Region V provided comments on Sections A and B in December 1986. Both Sections were revised to reflect US EPA comments. The revised Section A was transmitted to the US EPA on January 23, 1987. The revised Section B was transmitted to the US EPA on January 28 1987.

A May 12, 1987 letter from William D. Franz to James A. Reafsnyder provided a second round of US EPA comments on these revised FFCA deliverables. The FMPC response to these comments will be forwarded to US EPA in February.

Section C.1

Work on this item is complete.

- **Radiation Discharge Information**

Section A with Items A.1, A.2, and A.3

The FMPC off-site environmental monitoring program and the associated quality assurance plan were provided to US EPA in August 1986. A May 12, 1987 letter from William D. Franz to James A. Reafsnyder provided US EPA comments on these documents.

Four Quarterly Liquid Discharge Reports have been transmitted to EPA thus far. The fifth Quarterly Liquid Discharge Report for the period from October through December, 1987 will be transmitted to US EPA during the month of February.

TABLE 1.

STATUS OF ASSIGNMENTS FOR WORK REQUIRED ON
FEDERAL FACILITIES COMPLIANCE AGREEMENT ACTIONS

STATUS OF ACTIONS AS OF
31-Jan-88

COMPLETION
TIME AFTER
FFCA
SIGNED

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
CERCLA ACTIONS			
1	INTERIM REMEDIAL MEASURES		
1.A	Develop and implement O&M procedures and work practices to control radioactive emissions, including radon gas and decay products.	60 days	Complete. Comments were received from U.S. EPA on June 2, 1987. A comment response was transmitted to U.S. EPA on July 10, 1987. SOPs in process of being revised.
1.B.	Develop and provide to EPA a plan and implementation schedule for the control of radon at the K-65 silos.	30 days	Revised deliverable was transmitted to EPA on January 23, 1987. Second set of comments on original August 17, 1986 submittal received June 17, 1987. A comment response was transmitted to U.S. EPA on July 10, 1987.
	Develop & provide to EPA a plan & imp schedules for control of thorium compounds.		This schedule was provided to US EPA in the revised deliverable transmitted on January 23, 1987.
1.C.	Implement radon control plan approved by the EPA.	----	Phase I of K-65 interim remedial action is complete. Phase II to begin in Spring 1988.
	Implement interim control plan for thorium compounds as approved by the US EPA.		The thorium repackaging effort for Plant 8 thorium remains on schedule.
2	REMEDIAL INVESTIGATION/INVESTIGATION STUDY		
2.A.	RI/FS work to be conducted in accordance with EPA guidelines.	NA	No Action Required.
2.B.	-- No Action Required --	----	
2.C.	Provide to EPA analysis results for laboratory certification ---- SOW Task 7b.	45 days	Completed.
2.D.	Submit to EPA Work Plan for a complete sitewide RI/FS.	90 days	Work plan transmitted December 19, 1986. Supporting documents were transmitted on January 30, 1987.

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31-Jan-88

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
2.E	Amend and submit revised RI/FS work plan to EPA if deficiencies are found.		<p>Draft comments received from U.S. EPA on May 14, 1987. Final comments issued from U.S. EPA June 24, 1987. Comment responses and a revised Work Plan were transmitted to EPA on August 24, 1987.</p> <p>A meeting was held December 10, 1987 at US EPA-Region V in Chicago, Ill to discuss draft EPA comments on the Work Plan Rev. 1. Significant progress was realized at this meeting toward resolving the outstanding technical issues associated with the RI/FS Work Plan. Final US EPA comments on the Work Plan Revision 1 were received at the FMPC on December 28, 1987. A response is undergoing internal review.</p>
2.F	Implement tasks detailed in the approved RI/FS Work Plan.		<p>A conditional approval to initiate drilling 45 RI/FS monitoring wells was received from US EPA. Drilling of the wells was initiated on August 25, 1987. A total of 42 groundwater monitoring wells were completed by January 31, 1987. A request to initiate additional RI/FS tasks was transmitted to DOE on October 15, 1987. in letter #WMCO:EH:(IA):87-0293. This letter was transmitted to US EPA on October 22, 1987 via letter #DOE 63-88.</p>
3	REPORTS AND RECORD KEEPING		
3.B	RI/FS Progress Report		<p>The fifth RI/FS progress report was transmitted to US EPA on January 19, 1988.</p>
CLEAN AIR ACT			
A.	-- No Action Required --	----	
B.1.	Install real-time alarm monitors on all MAJOR emission points. Also list non-alarmed emission points.	30 days	Completed.
B.2.	Establish and implement administrative controls for real-time monitors	30 days	Completed.

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FEDERAL FACILITIES COMPLIANCE AGREEMENT ACTIONS

STATUS OF ACTIONS AS OF
31-Jan-88

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
	to ensure any unplanned releases will be detected and dealt with in 24 hours.		
B.3.	Establish and implement sample collection and analysis procedures and a QA plan to monitor ALL radionuclide emission points.	30 days	Completed.
B.4.	Establish schedule for the installation and replacement of emission control devices.	30 days	A schedule was transmitted to DOE on August 12, 1986 via letter #WMCO:EH:(RC):86-0102. An updated schedule for FY-88 is in final review.
	Prepare annual progress report on installation and replacement of emission control devices.	annually	The first annual progress report is undergoing internal review.
	Respond to U.S. EPA comments on Air Monitoring Network WDF-JAR dated 12-May-87.		In progress. WDF concerns on monitoring station no. 6 addressed in July 14-17, 1987 meeting at the FMPC. Actions to address WDF concerns on FMPC monitoring stations meeting EPA siting criteria to be implemented by April 1, 1988
C.	Provide annual reports to EPA per 40 CFR 61.94(c)	yearly	The annual report for CY-1986 was transmitted to EPA in 1987. The next annual report is due for transmittal by June 1, 1988.
D.1	Provide EPA yearly stack-testing schedule.	yearly	Completed. The first annual stack testing schedule was transmitted to EPA in December, 1986. A revised schedule was transmitted July 24, 1987. The second schedule was transmitted to DOE November 6, 1987 transmitted to EPA on December 31, 1987.
D.2	Provide EPA stack-test results for stacks tested that year.	45 days after test analyses completed	Final stack tests were completed in September, 1987. Stack test results for 10 stacks (including particulate radiological results) were all submitted to EPA by December, 1987. These results will also be transmitted to US EPA during the month of February, 1988 along with the fifth quarterly reports.
E.1	Maintain records of monthly particulate matter emissions.	----	Continuing.

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FEDERAL FACILITIES COMPLIANCE AGREEMENT ACTIONS

STATUS OF ACTIONS AS OF
31-Jan-88

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
E.2	Provide quarterly reports to EPA on these emissions.	quarterly	The initial report was transmitted on December 12, 1986. The second report was issued April 20, 1987. The third report was issued July 29, 1987. The fourth report was issued October 19, 1987. The fifth quarterly report will be transmitted to EPA during the month of February.
F.	Provide EPA list of environmental air monitoring equipment, including location and the O&M program.	60 days	Completed.
G.	Develop and provide EPA an O&M program for air pollution control devices.	90 days	Completed.
RCRA			
A.	Achieve compliance with interim status regulations.	30 days	Revisions to the A1-A7 submittals transmitted on January 23, 1987. Additional comments received on May 12, 1987. Response to be transmitted to US EPA following completion of internal review.
A.1.	Conduct hazardous waste determination on all waste streams.	30 days	Completed.
A.2.	Commence a hazardous waste analysis program.	30 days	Completed.
A.3.	Update of operating records pursuant to 40 CFR 265.73 and 265.309.	30 days	Completed.
A.4.	Include full name and signature and date received on manifests pursuant to 40 CFR 265.71.	30 days	Completed.
A.5.	Update the facility closure plan to reflect the year the facility expects to begin closure.	30 days	Completed.
A.6.	Begin collection of all run-off from the active portions of pit 4.	30 days	Completed.

TABLE 1.

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ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
A.7.	Prepare and maintain outline for a groundwater quality assessment program.	30 days	Completed.
B.	Submit to EPA for approval a detailed groundwater monitoring plan.	90 days	Complete. Additional comments received from US EPA on May 12, 1987. Response to be transmitted to U.S. EPA following completion of internal review.
B.1.	Determine groundwater flow at the RCRA regulated units.	90 days	Completed.
B.2.	Provide map showing location of all RCRA monitoring wells.	90 days	Completed.
B.3.	Include design and construction specs for all RCRA wells.	90 days	Completed.
B.4.	Monitor for all Appendix VIII constituents, including radionuclides.	90 days	Completed.
B.5.	Include a sampling and analysis plan to meet 40 CFR 265.92.	90 days	Completed
C.1.	Develop a closure plan for the landfill pursuant to 40 CFR 265.112.	60 days	Final closure plan was transmitted to US EPA on July 29, 1987.
C.2.	Develop a post-closure plan for the landfill pursuant to 40 CFR 265.118.	60 days	To be developed following RI/FS.

RADIATION DISCHARGE INFORMATION

A.	Respond to USEPA comments on Items A.1. - A.3. WDF-JAR dated 12-May-87.		In process.
A.1	Provide EPA with existing offsite environmental monitoring program.	30 days	Completed.
A.2	Provide EPA the QA program associated with the environmental monitoring program.	30 days	Completed.
A.3	Report to U.S. EPA, OEPA and Ohio Department of Health the	quarterly	Initial report transmitted on December 12, 1986.

TABLE 1.

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STATUS OF ACTIONS AS OF
31-Jan-88

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
	results of the continuous liquid discharge samples.		Second report transmitted April 20, 1987. Third report transmitted July 29, 1987. Fourth report was transmitted in November. The fifth quarterly report will be transmitted to US EPA during the month of February.
REPORTING REQUIREMENTS			
B	Issue monthly progress report of actions taken to ensure compliance with FFCA requirements.	30 days	Aug. 86 issued to US EPA Sep. 86. Sep. 86 issued to US EPA Oct. 86. Oct. 86 issued to US EPA Nov. 86. Nov. 86 issued to US EPA Dec. 86. Dec. 86 issued to US EPA Jan. 87. Jan. 87 issued to US EPA Feb. 87. Feb. 87 issued to US EPA Mar. 87. Mar. 87 issued to US EPA Apr. 87. Apr. 87 issued to US EPA May 87. May 87 issued to US EPA Jun. 87. Jun. 87 issued to US EPA Jul. 87. Jul. 87 issued to US EPA Aug. 87. Aug. 87 issued to US EPA Sep. 87. Sep. 87 issued to US EPA Oct. 87. Oct. 87 issued to US EPA Nov. 87. Nov. 87 issued to US EPA Dec. 87. Dec. 87 issued to US EPA Jan. 88.